

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.	Adv. Pro. No. 08-01789 (CGM) SIPA Liquidation (Substantively Consolidated)
In re: BERNARD L. MADOFF, Debtor.	Adv. Pro. No. 11-02568 (CGM)

**STIPULATION AND ORDER REGARDING FILING OF
REPLY IN FURTHER SUPPORT OF MOTION TO DISMISS**

Plaintiff Irving H. Picard (the “Trustee”), trustee for the substantively consolidated liquidation proceeding of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–*lll* (“SIPA”), and the chapter 7 estate of Bernard L. Madoff, and defendant Cathay Life Insurance Co. Ltd. (“Defendant” and, with the Trustee, the “Parties”), by and through their respective and undersigned counsel, state as follows:

WHEREAS, on January 13, 2022 the parties filed a Stipulation and Order setting March 25, 2022 as the deadline for Defendant to respond to the complaint in the Action, May 24, 2022 as the deadline for the Trustee to respond to any filed motion to dismiss, and June 23, 2022 as the deadline for Defendant to file a reply. ECF No. 114;

WHEREAS, on March 25, 2022, the parties filed an Amended Stipulation and Order setting April 25, 2022 as the deadline for Defendant to respond to the complaint in the Action, June 24, 2022 as the deadline for the Trustee to respond to any filed motion to dismiss, and July 24, 2022 as the deadline for Defendant to file a reply. ECF No. 115;

WHEREAS, on April 25, 2022, Defendant timely filed a Motion and Memorandum of Law to Dismiss Trustee's Complaint (the "Motion"). ECF Nos. 116-119. Defendant noticed the Motion for hearing on August 10, 2022, at 10:00 a.m.;

WHEREAS, On June 24, 2022, Trustee timely filed Opposition to Defendant's Motion (the "Opposition"). ECF Nos. 122-123;

WHEREAS, Defendant has requested additional time to file its reply and the Trustee has consented to the extension.

IT IS HEREBY STIPULATED AND AGREED that the deadline for Defendant to file a reply in further support of its Motion shall be extended to and including August 1, 2022.

[SIGNATURE PAGE TO FOLLOW]

Dated: July 19, 2022
New York, New York

BAKER & HOSTETLER LLP

By: /s/ Eric R. Fish
David J. Sheehan
Eric R. Fish
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
Email: dsheehan@bakerlaw.com
Email: efish@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for
the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the Chapter 7
Estate of Bernard L. Madoff*

Dated: July 19, 2022
Dallas, Texas

AKERMAN LLP

By: /s/ David W. Parham
David R. Parham (*Admitted Pro Hac Vice*)
C. Bryce Benson (*Admitted Pro Hac Vice*)
2001 Ross Avenue
Suite 3600
Dallas, Texas 75201
Telephone: (214) 720-4300
Facsimile: (214) 981-9339
Email: david.parham@akerman.com
Email: bryce.benson@akerman.com

*Attorneys for Defendant Cathay Life
Insurance Co. Ltd.*

SO ORDERED.

Dated: July 20, 2022
Poughkeepsie, New York



/s/ Cecelia G. Morris

Hon. Cecelia G. Morris
U.S. Bankruptcy Judge